

FACT SHEET

DRAFT HAZARDOUS WASTE PERMIT U.S. ARMY FORT WAINWRIGHT EPA ID NO. AK6 21002 2426 June 27, 2013

The U.S. Environmental Protection Agency (EPA) proposes to reissue a Resource Conservation and Recovery Act (RCRA) Permit to the U.S. Army Fort Wainwright (Permittee), in Fort Wainwright, Alaska. The draft Permit will include the closure requirements for an open burning/open detonation (OB/OD) unit and will update the corrective action requirements for site-wide cleanup at the Fort Wainwright facility. This Fact Sheet was prepared by the EPA in accordance with the requirements of Title 40 of the Code of Federal Regulations (CFR) § 124.8. The draft Permit is based on an administrative record which is available to the public for review at the EPA Office in Seattle.

A. PURPOSE OF THE PERMITTING PROCESS

The purpose of the permitting process is to design specific administrative and operational requirements under which the Permittee must operate to comply with the hazardous waste management requirements of RCRA and regulations promulgated by the EPA and codified in 40 CFR Parts 124 and 260 to 270.

The EPA is required to prepare a draft Permit which sets forth in one concise document all the applicable requirements that the EPA intends to require the Permittee to comply with during the ten-year (10-year) duration of the Permit. The public is given forty-five (45) days to review and comment on the draft Permit conditions prior to the Agency taking any final action on the draft Permit.

B. PROCEDURES FOR REACHING A FINAL DECISION

RCRA requires that the public be given forty-five (45) days to comment on each draft RCRA permit. The comment period will begin on June 27, 2013 and will end on August 11, 2013. Any person interested in commenting on this draft Permit or requesting a public hearing must do so within this forty-five (45) day comment period.

Comments on the draft Permit or a request for a public hearing should be submitted in writing by regular mail or e-mail to:

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U.S. EPA Region 10
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Comments should include all reasonably available references, factual grounds and supporting material.

When making a determination regarding the issuance of this draft Permit, the EPA will consider all written comments received during the public comment period, comments received during the public hearing, if one is held, the requirements of the hazardous waste statute and regulations, and the Agency's permitting policies.

When the EPA makes a final decision to either issue, deny, or modify the draft Permit, notice and a response to comments will be given to the applicant and each person who has submitted significant written comments or requested notice of the final decision. The final decision shall become effective no sooner than thirty (30) days after the notice unless a review is requested pursuant to 40 CFR § 124.19.

C. FACILITY DESCRIPTION

Background and Regulatory Authorities

The Fort Wainwright facility is located in the Fairbanks North Star Borough in interior Alaska and occupies 911,604 acres on the east side of Fairbanks. This site has been in continuous use by the military since 1938. A RCRA Permit was issued to the U.S. Army Fort Wainwright (Army) by the EPA and the Alaska Department of Environmental Conservation (ADEC) in 1991 (1991 Permit).

The 1991 Permit included requirements for storage of hazardous waste at three storage units, Buildings Y, Z and 5007, and included requirements for closure of those hazardous waste storage units. The 1991 Permit also included requirements for corrective action at all Solid Waste Management Units (SWMUs).

Environmental cleanup work at the Fort Wainwright facility is conducted under RCRA and the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA). For regulatory consistency the requirements of RCRA and CERCLA were integrated when the 1991 Permit was issued. A CERCLA § 120 Federal Facilities Agreement, U.S. Army Fort Wainwright Garrison Federal Facility Agreement, Docket Number 1092-04-10-120 (FFA), was incorporated by reference into the 1991 Permit.

The Army is required to have a RCRA Permit for the Fort Wainwright facility until all units have been closed and all corrective action has been completed. The hazardous waste storage units were closed in 2003 in accordance with the closure performance standard of the approved closure plan in place at the time of closure. Therefore the draft Permit does not have requirements for these units. However, the draft Permit includes the OB/OD unit, an inactive disposal unit located on the Fort Wainwright active small-arms impact range. The OB/OD unit was used to manage hazardous wastes which were unsafe for storage or transport, such as old, unserviceable munitions, by destroying the hazardous wastes through open burning or open detonation.

Although no longer used for open burning or open detonation of hazardous wastes, the EPA has allowed the closure of this unit to be delayed because the OB/OD unit is physically located on the Fort Wainwright active small-arms impact range. The draft Permit requires closure of the OB/OD unit when the small-arms impact range is no longer in use.

Site-wide corrective action has not been completed at the Fort Wainwright facility. Cleanup at the Fort Wainwright facility is ongoing under the FFA, which was amended in April 2007 and is included in the draft Permit as Attachment 7.

The EPA is proposing to reissue the RCRA draft Permit to the U.S. Army Fort Wainwright to address the delayed closure of the hazardous waste OB/OD unit and to complete site-wide corrective action. The draft Permit, like the 1991 Permit, integrates RCRA corrective action with the FFA and includes specific permit conditions for SWMUs and other areas of contamination not expressly addressed under the FFA.

Hazardous Waste OB/OD Unit

The OB/OD unit is located within the active small-arms impact range on the Fort Wainwright facility. The physical location is approximately 1,000 feet north of the Tanana River. The OB/OD unit measures approximately 150 feet by 450 feet. The OB/OD unit was used by the Army from the mid-1960s to between 1981 and 1986 for disposal through open burning and open detonation of unexploded ordnance, unused propellants, rocket motors, small-arms ammunition and other hazardous materials. The unit is no longer active and the physical grounds are now largely overgrown with tall grasses and low shrubs. The Army has institutional controls and site security measures in place to control access and work at the OB/OD unit.

The OB/OD unit is included as part of the CERCLA Record of Decision (ROD) for Operable Unit 5. It was identified as a RCRA-regulated land-based unit subject to closure in accordance with RCRA. Because the OB/OD unit is located within the active small-arms impact range and because unexploded ordnance will continue to be present at the active range, the CERCLA ROD explained that closure of the OB/OD unit would be delayed until the range was no longer active, or the Fort Wainwright facility was being closed, or for any other reason the Army would consider as a trigger to close the OB/OD unit. Under the integrated approach to CERCLA and RCRA at the Fort Wainwright facility, the OB/OD unit is recognized as a RCRA unit that will, in addition to RCRA permitting requirements, be managed and monitored as part of the requirements for Operable Unit 5. At least every five years the Army will evaluate whether the delay of closure is still appropriate.

The Army submitted an interim closure plan for the OB/OD unit, included in the draft Permit as Attachment 8. The draft Permit requires the Army to submit a revised closure plan, which meets the requirements of 40 CFR Part 264 for closure, to be implemented when the range is no longer active.

Solid Waste Management Units (SWMUs)

The draft Permit requires corrective action for SWMUs in accordance with RCRA requirements. However, similar to the provisions in the 1991 Permit, corrective action at the Fort Wainwright facility is generally being implemented in accordance with the FFA. Specific permit conditions

apply to the SWMUs which are not expressly included in the FFA. Descriptions of the SWMUs are included as Attachment 6 of the draft Permit.

D. CONTENTS OF THE PERMIT

The draft Permit updates the 1991 Permit, which expired on November 14, 2001. Once reissued, the draft Permit will be in effect for ten (10) years and will be reissued again as long as the OB/OD unit has not achieved final closure and/or corrective action has not been completed.

In the draft Permit many of the requirements of the 1991 Permit remain the same. However, several changes are being proposed to reflect current conditions at the Fort Wainwright facility. The requirements of the draft Permit which are different from those in the 1991 Permit are described below.

Proposed Changes to the Storage Requirements

Requirements in the 1991 Permit for storage in units Y, Z and 5007 and closure of those units have been eliminated. Those units have been clean closed, that is, all waste and contamination have been removed.

Proposed Changes to Closure Requirements for the OB/OD Unit

The 1991 Permit did not include requirements for closure of the OB/OD Unit. The draft Permit includes requirements for closure, but the requirements do not come into effect until the use of the small-arms impact range ceases. At that time, the Army must submit a revised closure plan for the OB/OD unit, and upon approval the EPA will modify the Permit to incorporate the revised closure plan. The draft Permit does not include operating requirements for the OB/OD unit, and does not allow use of the OB/OD unit for open burning/open detonation. The OB/OD unit has not been used for open burning/open detonation since the mid 1980s, and the EPA has determined that use of the unit for open burning/open detonation would pose a risk to human health and the environment. The draft Permit also contains the requirements for closure in accordance with the closure performance standard, and procedures for amendment of the closure plan and notification and completion of closure.

Proposed Changes to Corrective Action Requirements for SWMUs

The corrective action requirements for SWMUs in the draft Permit are essentially the same as those in the 1991 Permit. In the 1991 Permit, a permit condition included requirements for corrective action that did not integrate the FFA until the FFA was executed. The FFA was executed after issuance of the 1991 Permit so the condition specific to the FFA being executed is no longer appropriate. That requirement has been eliminated in the draft Permit. The draft Permit, like the 1991 Permit, includes conditions that specify that corrective action under the Permit, rather than under the FFA, applies to units the parties to the FFA transfer to the Permit or formally identify as outside the scope of the FFA, and to units discovered after the termination of the FFA. The corrective action requirements in the draft Permit will apply to any units not covered by the FFA, that are newly discovered and determined not to be part of the FFA, and that have not had cleanup completed after the FFA is terminated.

Updates to the Following Documents to Reflect Current Conditions:

RCRA Part A Application
Facility Description
Contingency Plan
Traffic Pattern
Facility Location Information
Description of Solid Waste Management Units (SWMUs)

E. PERMIT ORGANIZATION

The draft Permit is divided into three parts and includes eight attachments as listed below:

Part I	Standard Conditions
Part II	Closure of the OB/OD Unit
Part III	Corrective Action Requirements
Attachment 1	RCRA Part A Application (May 27, 2010)
Attachment 2	Facility Description (May 2010)
Attachment 3	Contingency Plan (April 2010)
Attachment 4	Traffic Pattern (May 26, 2010)
Attachment 5	Facility Location Information (May 26, 2010)
Attachment 6	Description of Solid Waste Management Units (May 26, 2010)
Attachment 7	Federal Facility Agreement, as amended (April 6, 2007)
Attachment 8	Interim Closure Plan for OB/OD Area (August 1999)